



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 3, 2020

BY ECF

Honorable Gregory H. Woods
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Edward Shin,
19 Cr. 552 (GHW)

Dear Judge Woods:

The Government writes respectfully in response to defendant Edward Shin's letter, dated December 2, 2020, requesting an adjournment of the deadline for pre-trial submissions and an adjournment of the trial date until the summer of 2021. With respect to the request for an adjournment of the deadline for pre-trial submissions, the Government consents, as reflected in the defense letter.

However, regarding the request for a trial adjournment until next summer, the Government respectfully requests that the Court continue its efforts to schedule the trial as soon as practicable. While the health concerns raised by the defense are certainly valid, the Government believes that a trial can be conducted safely in accordance with the District Court's protocols. Moreover, this case has been pending since May 2019 and pre-trial motions have already been litigated. Accordingly, the interest of the witnesses and the public weigh heavily in favor of setting a trial date as soon as practicable. While the District Court Trial Scheduling Committee or the rapidly-changing landscape of the world at large may very well delay the current trial date (or the backup date), the Government believes the interests of justice are best served by the Court's continuing efforts to schedule a trial as soon as practicable.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney for the
Southern District of New York

By: /s/
Tara LaMorte / Anden Chow
Assistant United States Attorneys
(212) 637-1041 / 2348